

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

**COMES NOW**, Defendants, ABCM Corporation (hereinafter "ABCM") and Hampton Motel Corporation (hereinafter "Hampton Motel"), and hereby give notice of the removal of the above stated action from the District Court of Franklin County, Iowa. In support of this notice, Defendants state as follows:

1. Plaintiff filed the above stated action on or about December 8, 2016. Defendant ABCM accepted service of a copy of the Original Notice and Petition on December 15, 2016. This Notice of Removal is filed within 30 days of the Defendant's first receipt of the Petition.

2. Removal in this action is appropriate pursuant to 28 U.S.C. §1441 and 28 U.S.C. §1331 on the grounds that Plaintiff is requesting relief under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. §216, et. Seq. Plaintiff’s claim is a request for relief under federal law

3. That notice of filing this Defendants' Notice of Removal will be filed with the Clerk of the District Court, Franklin County, Iowa, as provided by law.

4. There are no other matters pending in state court that will require resolution except for the allegations made in Plaintiff's Petition.

5. Plaintiff's attorney is Harley C. Erbee, ERBE LAW FIRM, 2501 Grand Avenue

Des Moines, Iowa 50312, email [erbelawfirm@aol.com](mailto:erbelawfirm@aol.com).

6. The removing Defendants are represented by Attorneys Raymond R. Aranza and Jamie M. Hurst, Valentine O'Toole LLP, 11240 Davenport Street, Omaha, Nebraska 68154, email [raranza@womglaw.com](mailto:raranza@womglaw.com) and [jhurst@womglaw.com](mailto:jhurst@womglaw.com).

7. Defendants attach hereto, marked as Exhibit A, a true and correct copy of all process, pleadings and orders served upon them in the state action.

**WHEREFORE**, Defendants respectfully provides notice of removal of this action from the District Court of Franklin County, Iowa to this Court and prays for such other and further relief as this Court deems proper.

**DATED** this 3rd day of January, 2017.

**ABCM CORPORATION, and  
HAMPTON MOTEL CORP., Defendants**

BY s/ Raymond R. Aranza

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2017, the undersigned electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Harley C. Erbee, AT002430  
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s/ Raymond R. Aranza